	-		1
<u>.</u>	0>	97.0 >	97.02
<7	6	<0.46	6
42.8	2	2.73	2
35	2.19	.19	2.19 4 µg/L
17.3	1,10	1,104	1,104 4 mg/L
8	6.6	6.6	6.6 4 µg/L
<u>ئ</u>	<b>\$0.</b>	<0.2	<0.2 4 µg/L
235	15.1	15.1	15.1 4 µg/L
73	4.71	71	4.71 4 µg/L
53	3.68	8	3.68 5 µg/L
			1 mg/L
			1 mg/L
0.03	3.07	3.07 161	3.07 161 mg/L
274	· 23,282	· 23,282 6	· 23,282 6 mg/L
		N	2 pCi/L
			1 pCi/L
			1 pci/L
		_	1 pCi/L
0.207	22.4		6
1.4	150	150 806	ļ
			1 mg/L
concentration (1) was	(z) waso	YSES	(2) MASS YSES TRATION
	3) (S)	0. NO. OF	d. NO. OF

. \$\frac{1}{2}

EFA I.D. NUMBER (copy from Item I of Form I) OUTFALL NUMBER 8

Form Approved OMB No. 158-R0173

PART C - If you are a primary industry and this outfall contains process wastewater, refer to Table 2c-2 in the instructions to determine which of the GC/MS fractions you must test for. Mark "X" in column 2-a for all such GC/MS fractions that apply to your industry and for ALL toxic metals, cyanides, and total phenols. If you are not required to mark column 2-a feecondary industries, non-process wastewater outfalls, and non-required GC/MS fractions], mark "X" in column 2-b for each pollutant you know or have reason to believe is present. Mark "X" in column 2-c for each pollutant you believe to be absent. If you mark either columns 2-a or 2-b for any pollutant, you must provide the results, of at least one analysis for that pollutant. Note that there are seven pages to this part; please review each carefully. Complete one table fall seven pages) for each outfall.

See instructions for additional details and requirements. IND000810861

						PAGE V-3	7>				13 001		
RSE	CONTINUE ON REVERSE					OH CIVIL 19.	as reponed o	All 9 analyses were below detection, as reported on Divinis	ses were bel	All 9 analy	_	01-61 X	Dioxin (1764-01-6) X
				٠				•	RSULTS	DESCRIBE RESULTS	_	<u> </u>	2.3.7.8.Teura-
										•-			NIXOIO
-		lbs	mg/L	482	1.13	0.01	3.11	0.016	17.9	0.09	<u>a</u>	Xa	15M. Phenois, Total
		lbs	mg/L	6	0.002	0.014			0.003	0.019		×	14M. Cyanide, Total (57-12-5)
(6)		lbs	µg/L	9	5.97	66.1			24.0	269	6	* ×	13M. Zinc, Total (7440-66-6)
		lbs	µg/L	4	<0.13	<b>^2</b>			<0.17	<b>^2</b>	<b>B</b>	O, Xa	12M. Thalllum, 1: Total (7440-28-0)
+		lbs	μg/L	4	<0.325	<b>^5</b>			<0.425	<5	<b>9</b>	×	11M. Silver, Total (7440-22-4)
		ibs	µg/L	10	2.35	28.2			5.3	<b>4</b> 5	•	.2;∷ X	10M. Selenium, Total (7782-49-2)
		Вbs	идл	7	0.527	6.2			<0.876	<7		×	9M. Nickel, Total: (7440-02-0)
		lbs	μg/L	5	<0.044	<0.6			<0.048	<0.58		∷ e X	8M. Mercury, Tota (7439-97-6)
		Ibs	μg/L	9	0.810	8.53			1.59	13		×	7M. Leed, Total-(† (7439-92-1)
(b)		ibs	µg/L	8	0.95	8.76			3.02	29		×	6M. Copper, Total (7550-50-8)
		lbs	mg/L	165	1.12	0.01	2.4	0.015	5.3	0.03		×	6M. Chromlum, Total (7440-47-3)
		lbs	μg/L	7	<0.21	<2.4			<0.258	<28		×a	4M. Cadmium, Total (7440-43-9)
		₹s	μg/L	4	0.08	1.25			0.118	2		×	3M. Beryllium, Total, 7440-41;7)
Б		ðs	μg/L	13	1.69	15.9			2.80	21		Хст	Arsenic, Total 40-38-2)
		lbs	μg/L	4	<1.3	<20			<1.7	<20		×	1M. Antimony; :- Total (7440-36-0)
										ENOLS	D TOTAL PH	DE, AN	METALS, CYANIDE, AND TOTAL PHENOLS
						CONCENTRATION	80 V (E)	CONCENTRATION	1 (1) mass	CONCENTRATION	BUIR SENT SENT	e a	(if available)
YSES	(1) CONCENT (1) MASS	D MASS	TRATION	ANAL-	XES. VALUE	CLONG TERMA	VALUE	6. MAXIMY	AAVLUE	<b>P</b> . 74	A. MARKIN		· AND CAS
mal)	18		.4. UNITS	'			3. EFFLUENT				3,		
									d requirement	See instructions for additional details and requirements	ions for add	structi	See in

Previous edition may be used. EPA Form 3510-2C (Rev. 12-80)

12V. Dichloro (3) bromomethene (75-27-4) > (3) (5) (5) (13V. Dichloro-1) diffuoromethene (5) GC/MS FRACTION - VOLATILE COMPOUNDS I. POLLUTANT AND CAS NUMBER 2V. Acrylonitrile : 21V. Methyl Chloride (74-87-3) 11V. Chloroform (67-66-3) 9V. Chloroethenek (75.00-3) 3V. Benzend 3.54 20V. Methyl Bromide (74-83-9) 17V, 1,2-Dichloro-propene (78-87-5) 16V. 1,1-Dichloro-ethylene (75-35-4) 16V. 1.2-Dichloro-ethane (107-06-2) (542-75-6) V: 1,1-Dichloro-iene (75-34-3) 19V. Ethylbenizene (100-41-4) 18V. 1,3 Dichloro × × × × × × × MARK X × × × × × × × × × × × × × × As per 46 Fed <u>^18</u> **^100 ^**10 **^10 ^ ^ ^ 5** ۸5 <u>۸</u> 5 **5**5 6 3 3 8 ζ, **&** 5 **%** eral Register 2264, this analyte b. MAXIMUM 39 DAY VALUE HOLLWELLEDINGS 3. EFFLUENT was removed for (z) = > 0.0 PAGE V-4 C.LONG TERM AVEG. VALUE d NO. OF ₹ CONCENTRATION Priority Pollutant List. TRATION Hg/L µg/L Hg/L µg/L µg/L µg/L Fg/L µg/∟ µg/∟ Hg/L μg/L  $\mu$ g/L Hg/L μg/L μg/L μg/L μg/L μg/L Hg/L Hg/L μg/L 4. UNITS BEWW 4 AVEITAGE VALUE 5. INTAKE (upilonal) CONTINUE ON PAGE V-5 NO.07

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EPA Form 3510-2C (Rev. 12-80) Previous edition may be used.



# DRAFT

Guidance on metals clean methods and data assessments

May 20, 1993

\_b5/20/93

A two step process must be implemented to effectively improve the quality of trace metals analysis in effluents and receiving waters. The capability and experience of analytical laboratories conducting trace metal analysis particularly with respect to use of trace metal clean methods is varied. -Because of this, the first step that any permittee or regulatory agency must take is an evaluation of the sampling, storage, processing and quantification procedures in place presently. The second step is to implement at those laboratories found to be deficient in the use of trace metals clean methods, a more effective program to assure that the introduction of extraneous metals to the sample collection and analysis process is minimized and that control of interferences at the instrument level actively addressed during analysis.

Assessing historical data quality:

## 1. Evaluating sources of error

The first step is to evaluate the potential for metals to enter the treatment plants by reviewing the sources of metals in the effluent e.g., discharges to the influent stream. If significant metals sources are suspected, high metals concentrations in the effluent may be real. If substantial sources are identified, metals levels should be relatively be low i.e., less than 100 ug/L. Levels frequently will fall in the less than 10 ug/L range. Some metals, such as Hg may by in the sub 0.1 ug/L (<100ng/L) range.

Second, evaluate whether the effluent or receiving water has the potential for significant salt concentrations from intrusions of salt water or other sources into the treatment system e.g., urban run from road salting, etc. If salt is likely to be present in the system, you can be confident that analysts using standard analytical methods are not controlling appropriately for the interferences caused at the instrument level. The only exception will be for samples that are extracted to isolate from the salt or to improve detection limits.

# Guidance for evaluating data quality

- 1. Examine the laboratory QC procedures for
  - a. Inclusion of method (procedural) blanks and also detection limits appropriate to low level metal measurements (at least 10 times less than the water quality Procedural blanks must document the sources of criteria or standard. contamination and should contribute no more than 10% of to the lowest effluent or receiving water concentration measured.
    - b. Determination of true procedural or method detection limits. The procedural blanks should be used to evaluate the detection limit for the analytical procedure. MDLs must be determined for the analytical batch being reported not as a general



detection limit determined at monthly or less frequently latervals. Lowest achievable detection limits are necessary for high quality metals analysis.

- c. Matrix spike and certified standard reference materials must be included with each sample batch. The matrix of these standards must approximate that of the being measured and concentrations of these samples must be in the concentration range of the expected (using clean methods) effluent or receiving water. Certified standards in the high ppb range are not acceptable. Recoveries must be within the published variability of the certified value for the analysis to be accepted.
- d. Estimates of precision must be included. Both sampling replicates as well as laboratory duplicates must be measured. Greater numbers of replicates will enhance the estimates of variability. Competent labs that have low blanks can usually demonstrate good precision through duplicate analysis. Acceptable variability between duplicates is <20%.
- 2. Perform sensibility checks on the reported concentrations.

Data should be compared to results collected and reported by laboratories using trace metal clean techniques and known for high quality work to see if the historical data is in a range found for the similar types of receiving waters. If the concentrations are outside of this range, and particularly on the high side, an evaluation of potential source of contamination should be implemented.

3. Evaluation of contamination control procedures.

The steps used to clean labware and storage bottles should be evaluated. Also, control procedures for contamination control during sample collection must be documented. Evaluate if reagents used for acidification or other processing must be appropriate to the low level metal analysis procedures. Reagent grade acids are unacceptable. Hot acid soaking of sample bottles and labware should be part of the contamination control process. Training in clean sample collection methods should be in evidence and documented. If a laboratory can not produce such documentation, sample results are automatically suspect and should not be used. Such simple procedures are not wearing gloves or using gloves with talc during sample collection and sample manipulations will cause poor analytical results.

## 4. Instrument interferences.

Proper evaluation of potential interferences at the instrument level must be part of the analytical scheme. Proper choice of the acids for sample preservation (Nitric is more acceptable than HCl as it significantly reduces major cation interferences on graphite furnace AAS.) Close matching of the sample matrix (within 10% of the major ion concentrations) to the standards matrix is an absolute necessity for metals analysis when using graphite furnace AAS or ICP measurements. This is particularly important if extraction concentration procedures are not employed for the analysis. Demonstration

# DRAFT

of the match in acids and salt content in the standards versus the sample matrix are critical for identifying potential interferences. Standard addition calibrations may be used if it can be demonstrated that matrixes are closely matched and that the certified values in SRMs are accurately measured.

5. Review of sampling and analysis by experienced researchers

Review of procedures by environmental chemists with demonstrated knowledge in contamination control and instrument interferences is a prerequisite for determining the acceptability of the analytical results. Such individuals should be tasked to review any set of data suspected of being of poor quality. These individuals should look at 5 stages of the analysis.

1. Labware cleaning procedures

2. Sample collection methods and procedures used to control contamination

3. Sample preservation and storage techniques to include the length of time samples are stored prior to processing. The longer the time the cleaner the storage bottles must be and the more stringent the cleanup steps required for successful analysis.

4. Sample processing steps.

5. Instrumental analysis.



# DRAFT

Guidance on the five most critical steps in metals analysis.

1. Labware and cleaning

Is plastic labware used? No other material is acceptable.

Is this plastic ware acid stripped to remove metals from the surface of the material and also subsurface of the labware?

Is there a set of labware dedicated for low level metals measures? Separate sets for receiving water and effluent samples should be maintained.

Is labware air dried in an area free of atmospheric particulate inputs? Use of lab towels or other such materials to dry labware is unacceptable.

Are all surfaces that contact the labware, sampling equipment, storage bottles, etc. washed (dilute acid) frequently and free of particulate materials prior to handling samples.

# 2. Sample collection/storage

Are metals samples collected as a separate aliquot preferably the first sample from the collection device) and not contacted by any sensor or other procedure used to measure other standard variables i.e., pH, DO, etc.? Sample integrity is an absolute requirement for clean metals analysis.

Use nonmetallic sampling devices (preferably plastic) and samples must be isolated from the atmosphere during collection and processing.

Use acid cleaned (50 degree C, 10% acid solution) labware and storage bottles.

Use acids and reagents of known low metals concentrations. Reagent grade acids are not acceptable except in the initial acid cleaning step of the labware.

Minimize storage times

Preserve samples at pH less than 2, pH 1 for Hg

No testing for standard parameters in the sample prior to sampling for metals or in the metals storage bottle.

Sample bottles must be dedicated to the type of sample e.g. effluent or receiving waters. No cross over of bottles is acceptable.

Sample bottles should be recleaned after use with hot dilute acid (50 degrees C 5% acid)



## 3. Sample processing

### 3a. Filtering

Use acid stripped plastic labware

Use membrane filters only for metals processing; glass fiber is unacceptable.

Use acid cleaned (hot dilute [10%] metal free dilute acids) for at least two days. Change acids and repeat at least once for receiving water filtration.

Filtering on open benches is not acceptable unless the process is completely isolated from atmospheric particulate inputs; filtration must be completed in an area free of atmospheric sources of particulate trace metals.

Minimize sample handling steps and contact with unnecessary labware e.g., pouring sample into a graduated cylinder to measure the volume is not necessary and can add contamination if improperly cleaned.

Dissolved sample receiving flasks or bottles must be cleaned as described above.

# 3b. Digestion/Preconcentration

Perform total recoverable digestion in a area isolated from atmospheric particulate matter. All processing containers must be protected from extraneous input of particulate matter found in the laboratory. No open beakers, sample bottles, etc. Processing can not occur in metallic hoods as corrosion of the metal parts can contribute significant particulate matter to the sample.

Use acid free reagents. If not commercially available, clean each reagents using chelation or extraction steps. Assume all reagents must be extracted to remove extraneous metals

Verify contribution of metals from each reagent used to process the sample.

Run procedural blanks with solutions of known starting metal concentrations to determine contribution from processing procedures.

### 4. Instrumental analysis

Check for interfering cations in the sample. Extraction of the sample to isolate the metal from these interferences and at the same time achieve low detection limits is recommended as the procedure of choice.



### Pitfalls of metals analysis

1. Inappropriate method detection limits relative to the water quality criteria.

2. Use of methods intended solely for compliance at water quality standards levels

3. Improper labware and labware cleaning procedures

4. Sampling protocols - improper attention to contamination control e.g. atmospheric input to the sample containers, placement of sampling gear on unclean surfaces., failure to use nontale plastic gloves

5. Storage protocols - Wrong grade of acids and cleaning of storage bottles

6. Interference control

Processing steps Reagent quality Instruments

7. Training in clean methods

8. Improper procedures for determining the procedural blank.

APPENDIX C-2
QA/QC RESULT DATA SHEETS

Table 1
Whiting ETL Wastewater (Outfall 001) - 1/14/94 (Results given in micrograms/liter or ppb)

	12938-75-Total	12938-75-Dissolved
Part B Metals	44	17
Aluminum	49	17
Barium	90	88
Boron	260	260
Cobalt	ND < 3	ND < 3
Iron	130	20
Magnesium	18000	20000
Molybdenum	20	16
Mongonos	107	94
Manganese	ND < 7	ND < 7
Tin	ND < 7	ND < 7
Titanium	NU < /	
Part C Metals		
Antimony	ND < 20	20
Arsenic	14	14
Beryllium	2	2
Cadmium	ND < 2	ND < 2
Caumium	NO < 10	ND < 10
Chromium	16	6
Copper	ii	ND < 1
Lead		ND < 0.5
Mercury	ND < 0.5	NO < 7
Nickel	ND < 7	
Selenium	39	38
Silver	ND < 5	ND < 5
Thallium	ND < 2	ND < 2
Zinc	31	23
_ ,		

Re-analysis for total metals: Magnesium = 17600; Manganese = 80; Iron = 80; Copper = 15; Zinc = 25.

Table 2
Whiting Quality Control Samples - 1/14/94
(Results given in micrograms/liter or ppb)

Same & Madala	Field Blank	Trip Blank	Equip. Blank
Part B Metals	ND < 4	ND < 4	ND < 4
Aluminum		ND < 1	ND < I
Barium	ND < 1	ND < 20	ND < 20
Boron	ND < 20		ND < 3
Cobalt	ND < 3	ND < 3	40
Iron	ND < 10	ND < 10	
Magnesium	ND < 1	ND < 1	22
Molybdenum	ND < 5	NO < 5	ND < 5
Manganese	NO < 1	NO < 1	2
Tin	NO < 7	ND < 7	ND < 7
Titanium	ND < 7	ND < 7	ND < 7
Part C Metals			110 - 00
Antimony	ND < 20	ND < 20	ND < 20
Arsenic	ND < 1	NO < 1	ND < 1
Beryllium	ND < 1	ND < 1	ND < 1
Cadmium	ND < 2	ND < 2	ND < 2
Chromium	ND < 10	NO < 10	ND < 10
Copper	ND < 3	NO < 3	ND < 3
Lead	ND < 1	ND < 1	48
Mercury	ND < 0.5	ND < 0.5	ND < 0.5
Nickel	ND < 7	ND < 7	9
Selenium	ND < 3	ND < 3	ND < 3
Silver	ND < 5	ND < 5	ND < 5
Thallium	ND < 2	ND < 2	ND < 2
Zinc	ND < 1	ND < 1	5

Analytical Research & Services Division source record numbers: CARN 94-001269 and 94-001536.

Table 3
Whiting ETL Wastewater (Outfall 001) - 2/11/94
(Results given in micrograms/liter or ppb)

	12938-80-Total	12938-80-Dissolved
Part B Metals		23
Aluminum	77	69
Barium	68	200
Boron	210	
Cobalt	ND < 3	NO < 3
	180	10
Iron	17000	19100
Magnesium	20	20
Molybdenum	34	32
Manganes <b>e</b>	ND < 7	ND < 7
Tin		ND < 7
Titanium	ND < 7	110 < 7
Part C Metals		ND 4 20
Antimony	ND < 20	ND < 20
Arsenic	20	21
Beryllium	ND < 1	ND < 1
Beryllium Codedom	. ND < 2	ND < 2
Cadmium	14	ND < 10
Chromium	16	4
Copper	10	ND < 1
Lead	ND < 0.5	ND < 0.5
Mercury		ND < 7
Nickel	ND < 7	30
Selenium	36	
Silver	ND < 5	ND < 5
Thallium	ND < 2	ND < 2
	74	27
Zinc	• •	

Re-analysis for total metals: Magnesium = 14600; Aluminum = 62; Iron = 120; Copper = 16; Zinc = 33.

Table 4
Whiting Quality Control Samples - 2/11/94

	Field Blank	Trip Blank
Part B Metals	16	13
Aluminum	15	ND < 1
Barium	ND < 1	ND < 20
Boron	ND < 20	10 < 20
Cobalt	ND < 3	NO < 3
Iron	ND_< 10	ND < 10
Magnesium	39	36
Molybdenum	ND < 5	ND < 5
Nanganese	ND < 1	ND < 1
Tin	ND < 7	ND < 7
Titanium	ND < 7	ND < 7
Part C Metals	·	ND 4 20
Antimony	ND < 20	ND < 20
Arsenic	1	10 4 1
Beryllium	ND < 1	ND < 1
Çadini um	ND < 2	ND < 2
Chromium	ND < 10	ND < 10
Copper	ND < 3	ND < 3
Lead	ND < 1	ND < 1
Mercury	ND < 0.5	ND < 0.5
Nickel	ND < 7	NO < 7
Selenium	3	ND < 3
Silver	ND < 5	ND < 5
Thallium	ND < 2	ND < 2
Zinc	ND < 1	ND < 1

Analytical Research & Services Division source record numbers: CARN 94-002714 and 94-003103.

Table 5
Whiting ETL Wastewater (Outfall 001) - 3/2/94
(Results given in micrograms/liter or ppb)

	12938-83-Tot	12938-83-Dis	Trip Blank
Part B Metals	es .	26	46
Aluminum	51	79	ND < 1
Barium	76		ND < 20
Boron	230	240	ND < 3
Cobalt	ND < 3	ND < 3	
Iron	100	20	10
Magnesium	18500	19900	50
Magileston	19	21	ND < 5
Molybdenum	31	28	ND < 1
Manganese	ND < 7	ND < 7	ND < 7
Tin	ND < 7	ND < 7	ND < 7
Titanium	י > עה	W < 1	
Part C Metals		ND - 00	ND < 20
Antimony	ND < 20	ND < 20	ND < 1
Arsenic	12	11	
Beryllium	ND < 1	ND < 1	ND < 1
Cadmium	ND < 2	ND < 2	ND < 2
Caum rum	ND < 10	ND < 10	ND < 10
Chromium	18	4	ND < 3
Copper	• 7	ND < 1	ND < 1
Lead	ND < 0.5	ND < 0.5	ND < 0.5
Mercury		ND < 7	NO < 7
Nickel	ND < 7	25	ND < 3
Selenium	30		ND < 5
Silver	ND < 5	ND < 5	ND < 2
Thallium	ND < 2	ND < 2	
Zinc	24	17	ND < 1

Analytical Research & Services Division source record numbers: CARN 94-003752 and 94-003946.

Table 6
Whiting ETL Wastewater (Outfall 001) - 3/9/94
(Results given in micrograms/liter or ppb)

	ETL-Total	ETL-Dissolved	Trip Blank
Part B Metals	62	32	ND < 4
A7 um i num		EQ.	ND < 1
Barium	58	240	ND < 20
Boron	240	ND < 3	ND < 3
Cobalt	ND < 3		ND < 10
Iron	100	20	13
Magnesium	18300	20200	
Mo lybdenum	81	73	ND < 5
Manganese	26	24	ND < 1
Tin	ND < 7	NO < 7	ND < 7
Titanium	ND < 7	ND < 7	ND < 7
1 1 Can Law	<b>VID</b> - 1		
Part C Metals			
Antimony	ND < 20	ND < 20	ND < 20
	16	17	ND < 1
Arsenic	ND < 1	ND < 1	ND < 1
Beryllium	ND < 2	ND < 2	ND < 2
Cadmium	10	ND < 10	ND < 10
Chromium	18	6	ND < 3
Copper	ii	ND < 1	ND < 1
Lead		ND < 0.5	ND < 0.5
Mercury	ND < 0.5		NO < 7
Mickel	ND < 7	ND < 7	ND < 3
Selenium	33	31	
Silver	ND < 5	ND < 5	ND < 5
Thallium	ND < 2	ND < 2	ND < 2
	26	18	ND < 1
Zinc		= -	

Analytical Research & Services Division source record numbers: CARN 94-004270 and 94-004582.

Table 7
Whiting ETL Wastewater (Outfall 001) - 4/14/94
(Results given in micrograms/liter or ppb)

Blank	ETL-Total	ETL-Disso	ved Trip
Arsenic Cadmium Copper Lead Nickel	18 ND < 2 10 8 ND < 7 20	11 ND < 2 5 1 ND < 7 16	2 ND < 2 ND < 3 ND < 1 ND < 7 ND < 1

Analytical Research & Services Division source record numbers: CARN 94-006855 and 94-006888.

Table 8
Whiting ETL Wastewater (Outfall 001) - 4/26/94
(Results given in micrograms/liter or ppb)

Blank	ETL-Total	ETL-Dissolved	Trip
Arsenic Cadmium Copper Lead Nickel Zinc	13 ND < 2 8 4 ND < 7 15	16 ND < 2 NO < 3 ND < 1 ND < 7	ND < 1 ND < 2 ND < 3 ND < 1 ND < 7 ND < 1

Analytical Research & Services Division source record numbers: CARN 94-006781 and 94-006838.

Gary R. Chipman August 17, 1994

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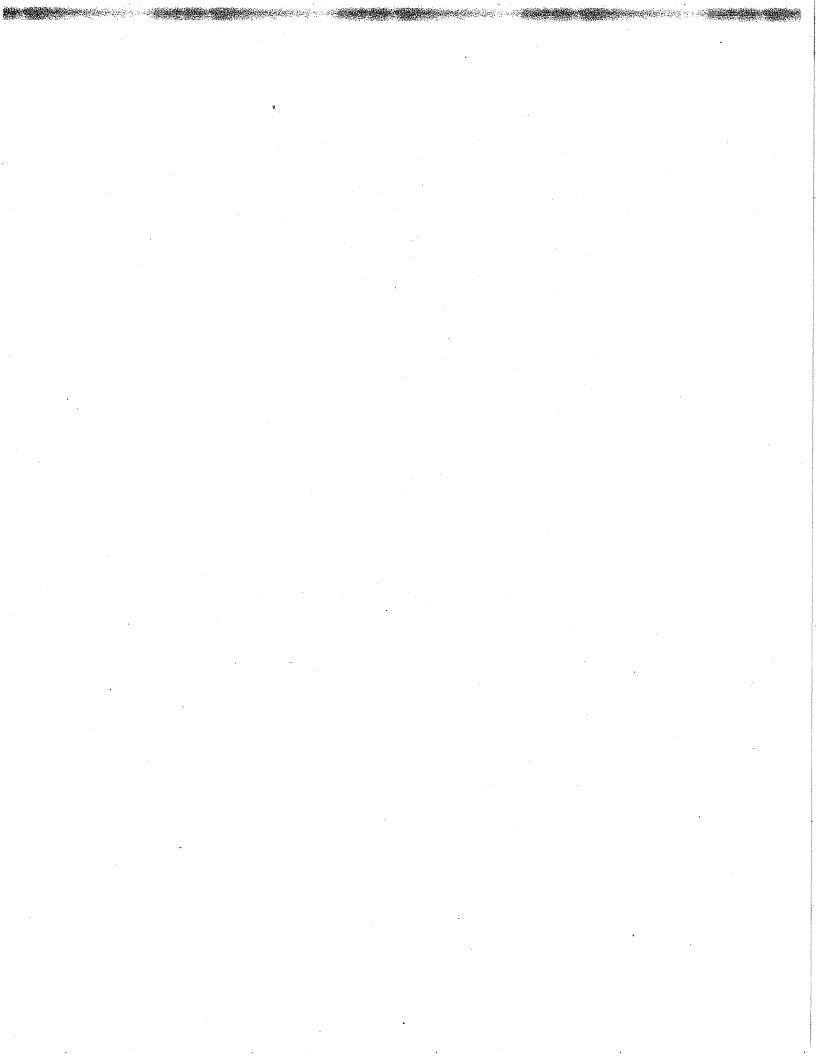
Table 9
Whiting ETL Wastewater (Outfall 001) Collected during May and June, 1994, for Arsenic Analysis (Results given in micrograms/liter of ppb)

Collection Date	Sample No	o. Arsenic ug/L	C
5/4/94	ETL-001 2-N-0 2-N-1 2-N-2 2-N-3	NA 16 16 16 420 ND <1	
5/10/94	ETL-001 Trip Blank	18 NA	
5/17/94 5/26/94	ETL-001 5-N-0 5-N-1 5-N-2 5-N-3	17 16 15 250 4	
6/1/94	6-N <b>-</b> 0	21	
6/7/94	7-N-0 7-N-1 7-N-2 7-N-3	13 12 433 MD <1	

Analytical Research & Services Division source record numbers: CARN 94-006232, 94-006506, 94-006551, 94-006654, 94-006963, 94-007447, 94-007608, 94-007978, 94-007979, 94-008146 and 94-008318.

Gary R. Chipman August 17, 1994

94230NAP0055



# VOLUME I NPDES PERMIT RENEWAL APPLICATION FORM 2C ITEM V FOOTNOTE D

### **ARSENIC SPECIATION STUDY**

Prepared for:

AMOCO OIL COMPANY Whiting Refinery, Indiana

Prepared by:



August 1994



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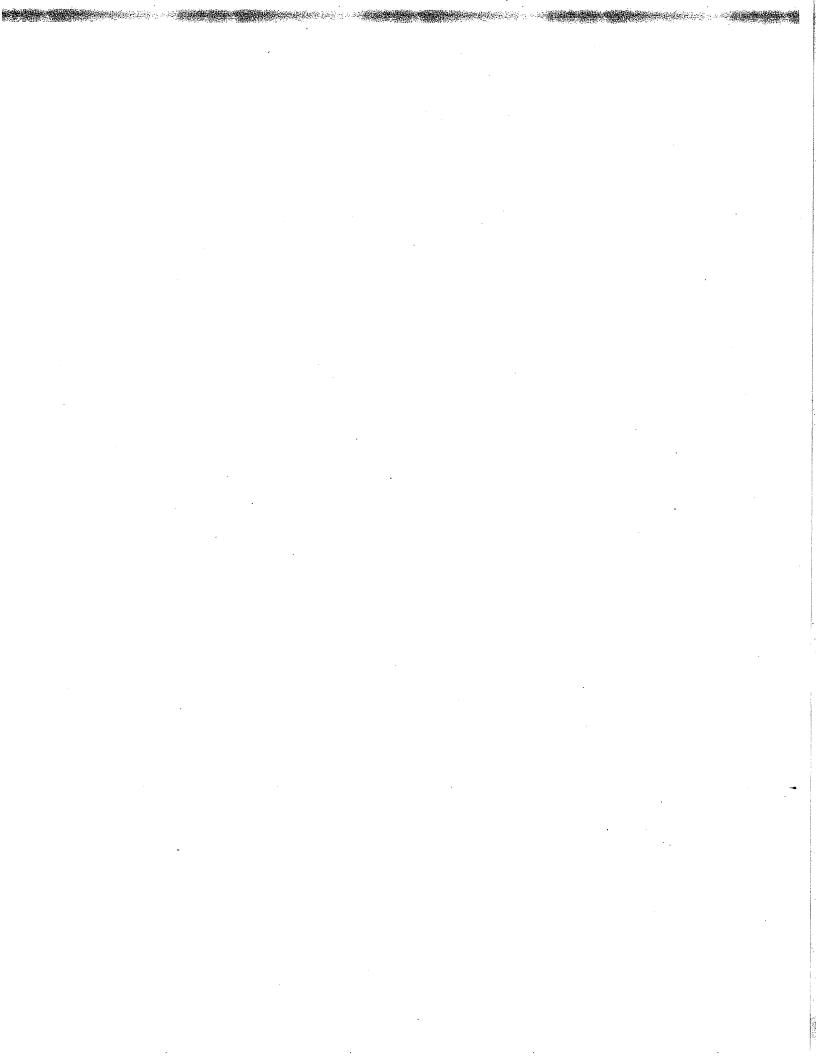
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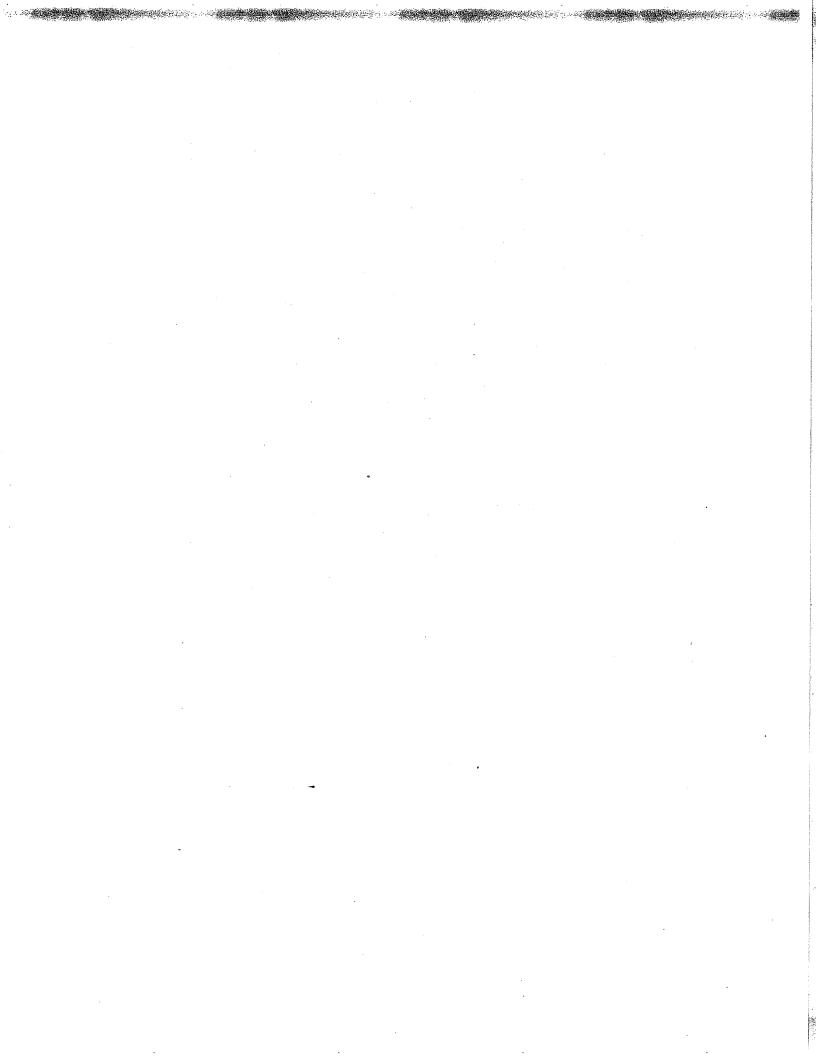
### **FOREWORD**

This report is Footnote D to Form 2C, Item V, of Volume I of Amoco's NPDES Permit Renewal application.

The Indiana Water Quality Standards (IWQS) in 327 IAC 2-1-6(a) Table 1 present acute and chronic criteria for trivalent arsenic, i.e., arsenic(III). Arsenic exists as arsenic(III) in a reduced (e.g., low oxygen) environment. Such reducing conditions do not exist in the Whiting wastewater treatment plant (WWTP) process units, the Outfall 001 effluent, or the Indiana waters of Lake Michigan. It should be noted that the total arsenic concentration in Amoco's treated effluent at end-of-pipe, is far less than the allowable federal drinking water concentration for total arsenic.

Amoco has reviewed the arsenic speciation procedures presented in peer-reviewed literature. Amoco has identified a speciation method that yields valid and representative results. The form and species of the arsenic present in the treated effluent from Outfall 001 at the Whiting Refinery have been characterized using this method. Arsenic(III) was not detected in the Outfall 001 treated effluent. This conclusion is consistent with the oxidizing conditions present in the WWTP treatment units, the treated effluent, and the Lake Michigan receiving water. Hence since, arsenic(III) is not detected, the application of the IWQS arsenic(III) criteria to Amoco's renewed permit is not appropriate.

Section 1 contains the introduction to this report. Section 2 presents a review of arsenic water quality criteria established by USEPA and Indiana. Section 3 discusses the environmental chemistry of arsenic and USEPA-approved methods of analyzing total arsenic. Section 4 outlines the development of the arsenic speciation study, including the sampling and analysis program. Section 5 presents the results of the study, and Section 6 presents conclusions drawn from the study.



### **SECTION 1**

### INTRODUCTION

Indiana Water Quality Standards (IWQS) set criteria for arsenic(III). Arsenic exists as trivalent arsenic, i.e., arsenic(III), in reduced environments (e.g., low oxygen) but as pentavalent arsenic, i.e., arsenic(V), where oxidizing conditions exist. Any arsenic in the Amoco treated effluent will be in the arsenic(V) species given the oxidizing nature of the WWTP process treatment units and the Lake Michigan receiving water. Lake Michigan water, which is well aerated, is the source of water for the refinery. The application of any arsenic(III) criteria in Amoco's renewed permit would, therefore, be inappropriate for three reasons. First, arsenic(III) should not be present based on the oxidizing environment of wastewater treatment system, the characteristics of the treated Outfall 001 effluent, and arsenic chemistry. Second, sampling and analysis has confirmed that arsenic(III) is not present in the treated effluent. Third, the total arsenic concentration in Amoco's treated effluent, at end of pipe, is far less than the allowable federal drinking water concentration for total arsenic.

### FACILITY DESCRIPTION

The Amoco Whiting Refinery includes processes such as distillation, catalytic reforming, hydrodesulfurization, catalytic cracking, alkylation, coking, treating, extraction, dewaxing, grease and lube oil production, asphalt production, sulfur recovery, and power generation. The refining throughput varies with product demand and other market considerations, but its maximum monthly average capacity is 410,000 barrels of crude oil per day. Amoco produces a variety of products including jet fuel, gasoline, diesel fuel, heating fuel, lubricating oils, asphalt, coke and waxes. The refinery generates process waters which are continuously treated onsite at an advanced biological wastewater treatment plant (WWTP). Operation of the activated sludge treatment process requires an aerobic environment at a neutral pH of 6

to 9 s.u. Stormwater run-off and recovered groundwater from refinery areas are also treated at the WWTP. The treated effluent is then discharged to Lake Michigan through a National Pollutant Discharge Elimination System (NPDES) permitted outfall (Outfall 001). Outfall 001 is regulated by NPDES Permit IN0000108 (the NPDES Permit) which became effective on April 1, 1990 and expires on February 28, 1995. The effluent flow from Outfall 001 ranges from 13 (long-term average) to 23 (maximum monthly average) million gallons per day (mgd).

The NPDES Permit has limits for Outfall 001 derived from technology-based effluent limits and historical wastewater treatment plant performance. Amoco has consistently attained these permit limits with high quality effluent that meets or is better than "Best Available Technology" (BAT) effluent limitations. It is anticipated that the new permit will contain effluent limits based on the Indiana Water Quality Standards (IWQS) as well as applicable technology-based standards. As part of the permit renewal application, Amoco is submitting this report to present the results of an arsenic speciation study on the Outfall 001 treated effluent.

It should be noted, as presented in Form 2C, Item V, Part C, that the maximum measured amount of total arsenic in the treated effluent is 21  $\mu$ g/L. This is far below the federal primary drinking water standard for total arsenic of 50  $\mu$ g/L.

### STUDY OBJECTIVES

The purpose of this study is to determine whether the IWQS for arsenic(III) applies to Amoco. The objective of this study is to present analytical data to demonstrate the speciation of arsenic in the Outfall 001 effluent. Since there are currently no USEPA-approved analytical